

planners, & management consultants

CAMP DRESSER & McKEE INC.

3445 Executive Center Drive, Suite 220 Austin, Yexas 78/31 512 345-6651

April 14, 1986

Mr. John Cochran U.S. Environmental Protection Agency First International Building 1201 Elm Street Dallas, TX 75270

Doc. Ctrl. No. 143-TS1-EP-CLVJ-1

RE: South Cavalcade Street; Weekly Compliance Monitoring Report

Dear John:

Enclosed are summaries of compliance monitoring activities and field notes for compliance monitoring at the South Cavalcade Street Site for March 24 through 28, 1986, and March 31 through April 4, 1986.

Sarah Landtiser's summary memo contains several observations and comments. Three of the observations and comments relate to decontamination procedures and health and safety at the site. I urge you to look into the problems described by Sarah.

Sarah's fourth comment probably falls outside of the scope of our work, and you can ignore it or pass it along to Koppers Company as you see fit. From EPA's perspective, I see two and possibly three areas of concern:

- 1. Having only one individual operating the drilling rig does not appear to me to be a safe practice, neither for that individual nor for others working near the rig.
- Should less than professional attitudes displayed by site personnel deteriorate to action, EPA might find itself in an untenable position.
- Less than diligent pursuit of the remedial action tasks requires that CDM remain in the field longer than necessary, increasing EPA's and, ultimately, Kopper's costs.

I had Mike Young, the other CDM person performing the bulk of the compliance monitoring at the South Cavalcade Street Site, review Sarah's memo for agreement with his own observations. Mike concurred with Sarah in every respect. I am assured, and I assure you, that the comments and observations made by CDM are not the result of interfirm rivalry nor are they based on problems CDM has encountered with McBride-Ratcliff at another site. The issues we have raised are of genuine concern and are documented in the field notes we have provided you.

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Although I have been told that we have received copies of field notes prepared by McBride-Ratcliff personnel, I have not yet seen them.

As you requested, copies of the summary and notes are enclosed for transmission to Koppers.

Sincerely,

CAMP DRESSER & MCKEE INC.

Robert S. Kier To Site Manager

RK:tp

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Memorandum			
Date 4/4/86		· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
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July activities a four boxeholes ser was being repaired	I the Koppers &	South Cavalca	le sib. n
Four boreholes Des	e completed. On	1/1/36 the	drilling rig ?
	*-		000
. The bereholes are	summarged below	J:	
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5ck-104-5810 4/2/	['] 86 58'	30 7 21	slight HC odor fro.
SCK-AZ6-5801 4/3/		trae	t of treated wooder
SCK-127-5801 4/4/	60'		odor, no visval
* includes diplicate -			
••	•		
I have the follower	ing comments to	mokei	**************************************
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on, allowing f	ossible overflow	of drunes o	thould sein
occur. This	was brought to	The attention	of MRA
employer, druce	ce Urban on o	several occasion	my sill
little to no	results.		Anna de la companya d
The state of the s	in the second way of the second secon	3- m - American Maria (1994)	

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2) Thoroughness of decon procedures could be improved upon.

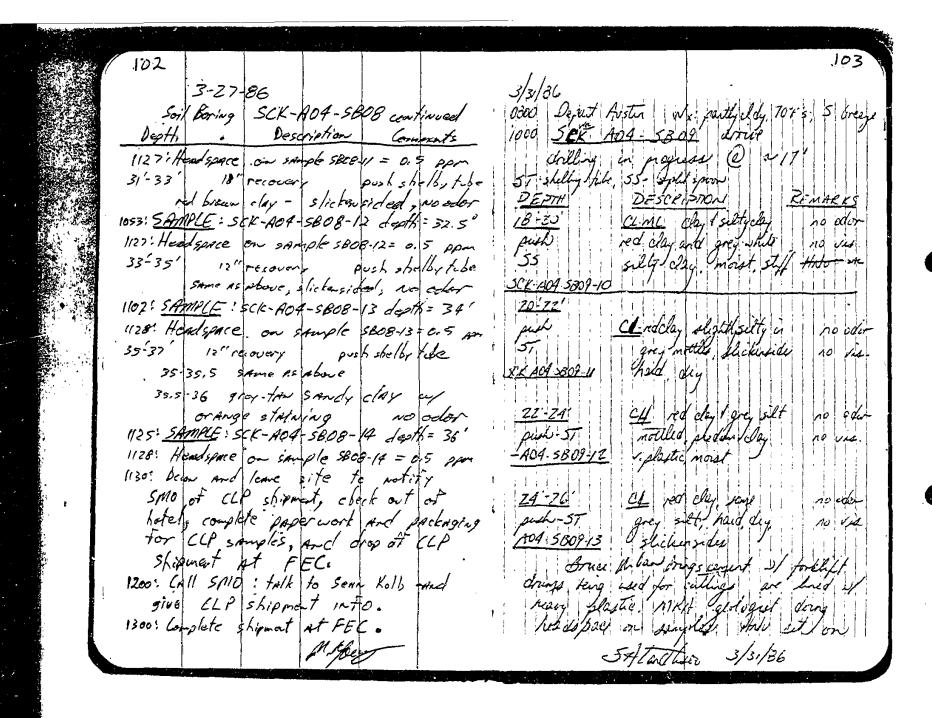
Split spoons or shelly takes are commonly placed on the ground after they have retrieved sample and before opened or samples are extended. or Chances of cross-contangination occurring are probably quite small, however this is not a good hight and when a very contangerated hole is encountered it would be possible to cross-contaginate.

3) In several occasions on this is not available foruse. Breathing you readings are never taken at specified intervals as they are done religiously in Texaskana.

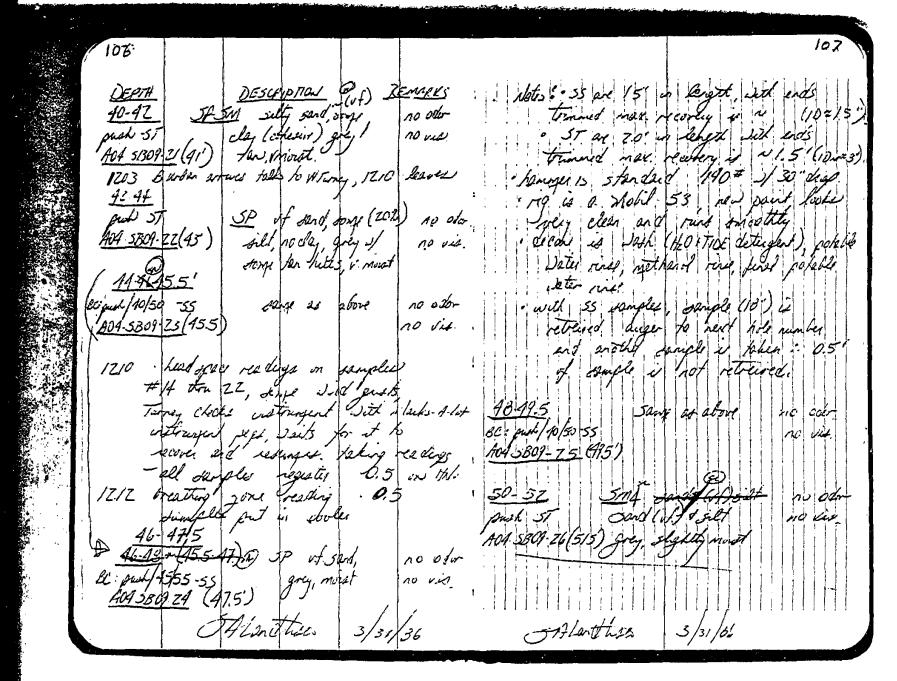
4) Perhaps this next comment is beyond the responsibilities of compliance monitoring, but I would like to make it arguing. The driller, B. Van Andrew of Van and Some is predimpinately working behind the rig alone. His kelper is tied up according to the and for spoons between samples. This situation is potentially very dangerous. Another helper is needed, whether it he from MKA or Van and Jons is insignificant. This situation is not only dangerous but it is also slaving down a peraturn considerably.

I observed B. Urban, MRA sothout anything to dor or sithout notivation to do whatevey it is he is supposed to be doing. On several occasions he was asked to assist deconning, he did once for ZO yenutes. To be frank, he does not care

about the job he is doing this is substantiated by his remarks as well as his actions. In my opinion, his presence on this site creates a bad situation. It is apparently his responsibility to make sure drivers are collected and sealed up. His performance on the task is clearly insufficient. He (puraps jakingly) remarked I should just "shoot the" (decon water holding "tarks" ... and "let the water run all over the ground" to get some attention from his superiors) to get things done, ie, get more druns/storage tank space. An athitude such as this is for from professional and has no place on a hazardors waste site. It is very unfortunate that drilling operations are proceeding at one hole per day. It MRA was more willing to work a few horse of overtige & and/or designate two capable onsit sersonnel, I am confident for deep holes see day would be guits easy, and with Neatth and Safety considuations is spiral, unrecessarily extending this got into the summers heat would be



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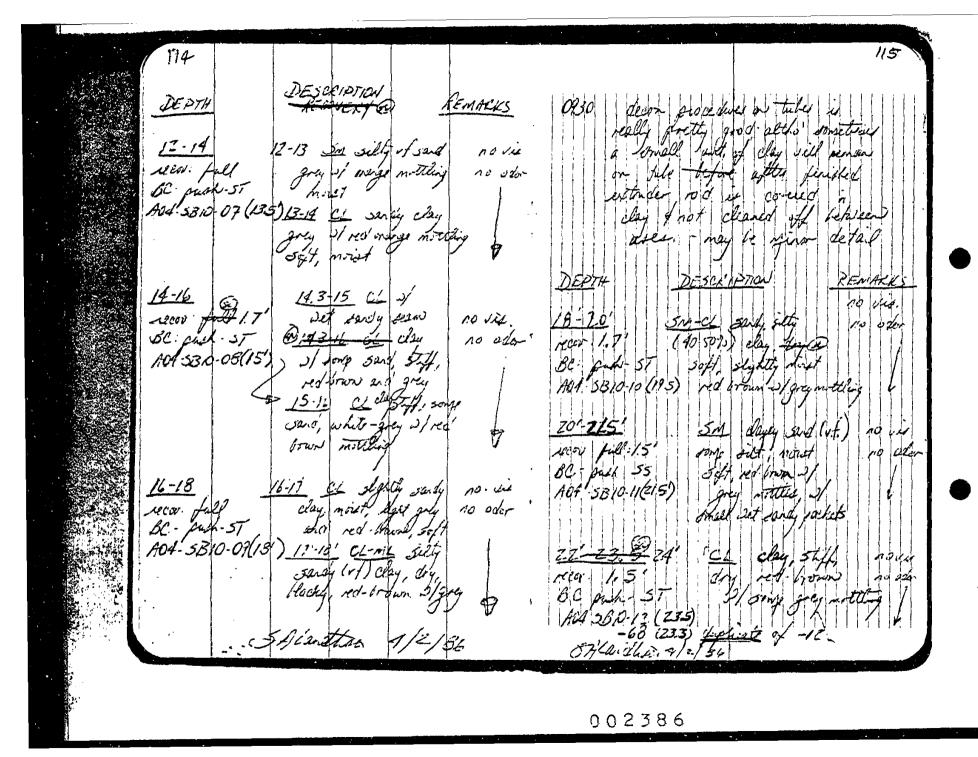
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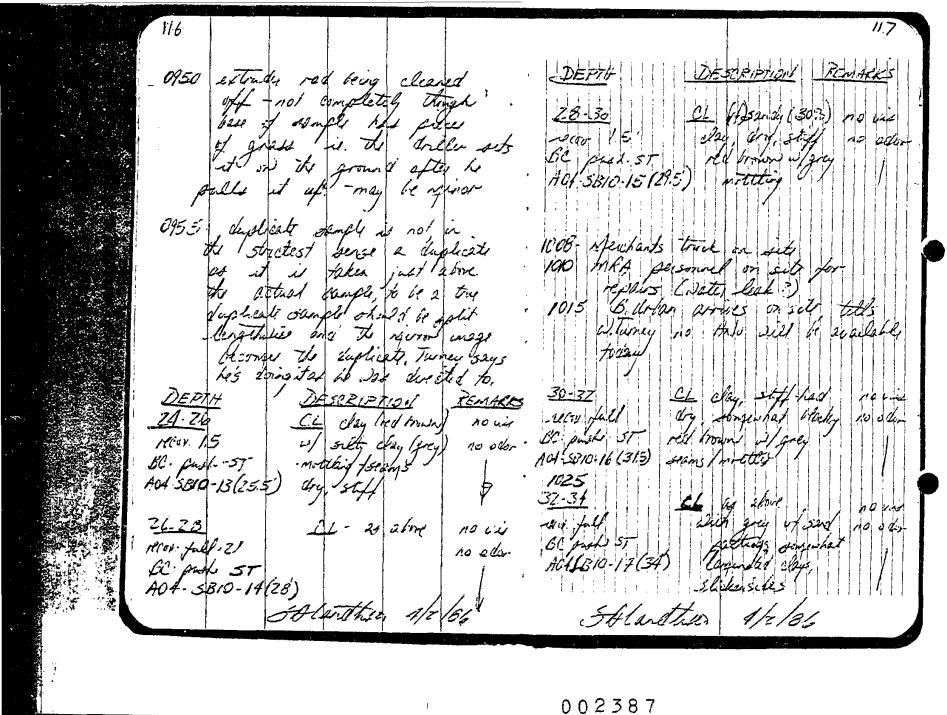
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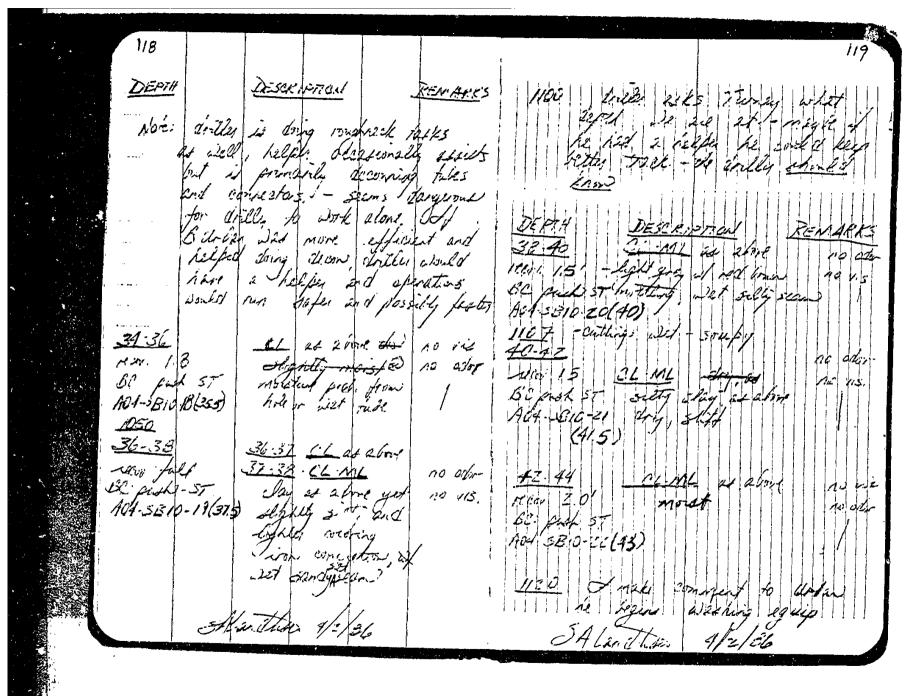
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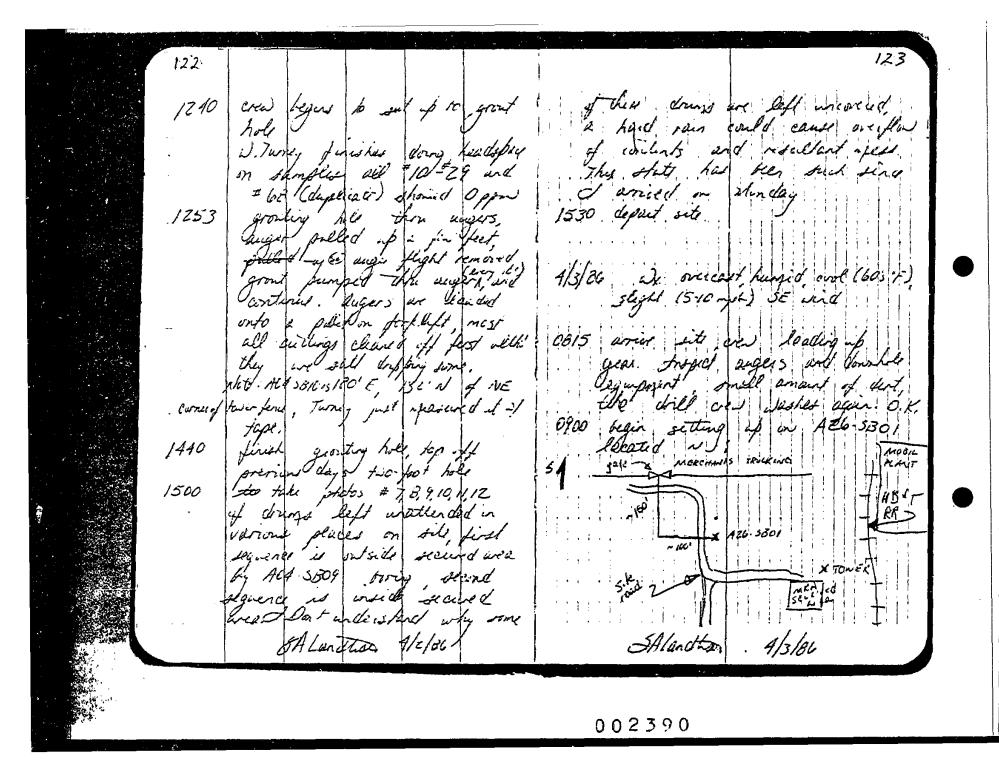


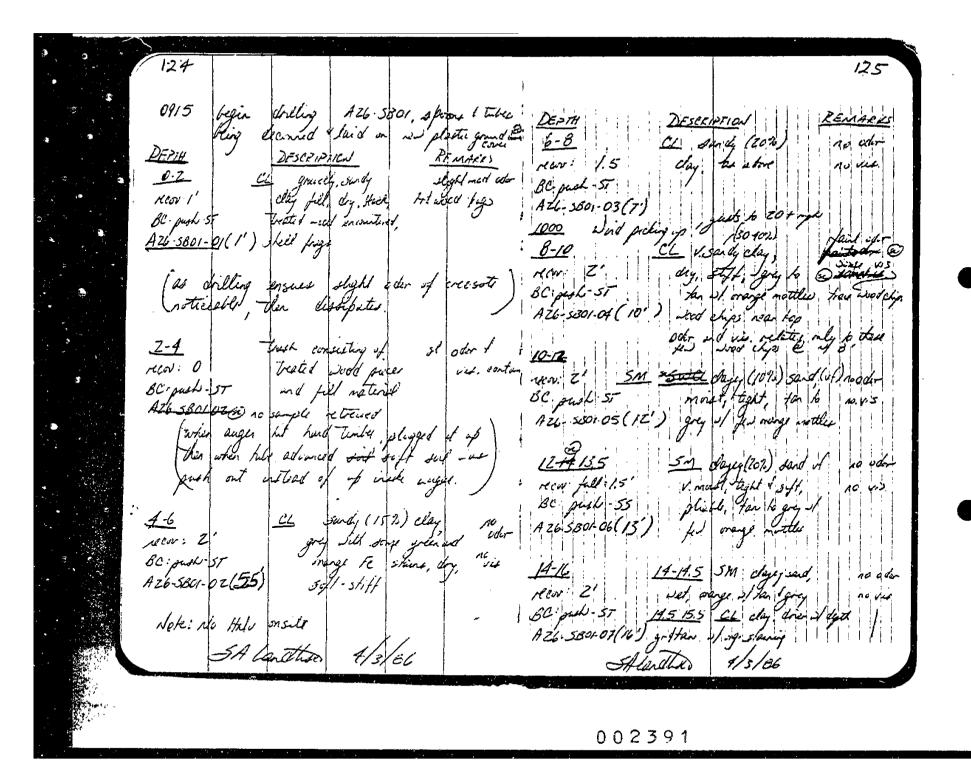




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